

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

WANDA EVELYN VAZQUEZ MEJIAS

DEBTOR

CASE NO. 19-04434 ESL

CHAPTER 7

NOREEN WISCOVITCH RENTAS  
CHAPTER 7 TRUSTEE  
Plaintiff

ADV. PROC. 22-00031

VS.

APPROVAL SALE OF PROPERTY OF CO-  
OWNED PROPERTY

EDWIN FRANCISCO VAZQUEZ MEJIAS  
Defendant

**JOINT MOTION REQUESTING STAY OF PROCEEDINGS PENDING  
SETTLEMENT NEGOTIATIONS**

TO THE HONORABLE ENRIQUE S. LAMOUTTE  
U.S. BANKRUPTCY COURT JUDGE:

COME NOW, Plaintiff, NOREEN WISCOVITCH RENTAS (“Trustee”), and Defendant EDWIN FRANCISCO VAZQUEZ MEJIAS (“Vazquez Mejías”), represented by their respective counsel of record and before this Court respectfully state and pray:

1. On May 17, 2022, Trustee filed the captioned adversary proceeding for the sale of co-owned property.
2. On June 17, 2022, Vazquez Mejías filed a request for an extension of 30 days to answer the complaint, which was granted by the Court on June 21, 2022. Other extensions were later granted by the Court. See docket nos. 10, 11, 14, 15, 18, 21, 26 and 27.
3. Preliminary Pretrial has been scheduled in this case for November 4, 2022. See docket no. 22

4. On October 19, 2022 Defendant filed a Motion to Dismiss. See docket no. 29.

5. Since the filing of the petition for relief the parties have been engaged in good faith negotiations for the settlement of the controversies, without the need to engage in lengthy litigation.

6. Parties understand that they can reach a settlement, which will reduce the costs of litigation and expedite the resolution of the controversies before this Court. However, to date additional time is needed for the parties to conclude settlement negotiations. If settlement is not possible then parties would proceed with the consideration of dispositive motion filed before the Court. But it is necessary that no efforts be divested in further litigation at this time because it will use economic resources that can be used in the settlement efforts.

7. Therefore, in view of the above stated, the Parties respectfully request that all proceedings be stayed until December 30, 2022. After said period the parties will inform the Honorable Court of the outcome of the settlement discussions and if need be an Answer to the Motion to Dismiss would be filed by Trustee on or before January 30, 2023.

**WHEREFORE**, it is respectfully requested from this Honorable Court to grant this motion and enter order staying proceedings until December 30, 2022.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 27<sup>th</sup> day of October 2022.

CERTIFICATION: I hereby certify that the foregoing document has been electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record registered in the use of the CM/ECF system.

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